

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	<b>Case No. 1:22-cr-417-RDP-NAD</b>
	)	
<b>KRYSTAL DIANE PINKINS</b>	)	

**PROPOSED VOIR DIRE QUESTIONS OF THE UNITED STATES**

Comes now the United States of America, by and through undersigned counsel, and hereby requests that the following jury offense instructions be given during the Court's charge at the trial of the above-captioned matter.

Respectfully submitted this the 18<sup>th</sup> day of September 2023.

PRIM F. ESCALONA  
United States Attorney

*/s/ Electronic Signature*  
JONATHAN S. CROSS  
Assistant United States Attorney

*/s/ Electronic Signature*  
JOHN B. FELTON  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been electronically filed with the Clerk of Court, Northern District of Alabama, on this day, using the CM/ECF filing system that will send notification of said filing to counsel for the defendants.

*/s/ Electronic Signature*  
JONATHAN S. CROSS  
Assistant United States Attorney

## **Questions**

1. Does anyone know or is anyone related by blood or marriage to any of the following individuals who may be called to testify in the trial of this case:

### **[LIST OF WITNESSES TO BE PROVIDED BY GOVERNMENT]**

2. Does anyone know or is anyone related by blood or marriage to the defendant, Krystal Diane Pinkins?
3. The defendant is represented by attorney Justin Wilson. Does anyone know of, heard of, or ever used the professional services of Mr. Wilson?
4. The United States is represented in this case by Assistant United States Attorney Jonathan Cross or Brad Felton. Does anyone know or is anyone related by blood or marriage to either Mr. Cross or anyone else who works for the United States Attorney's Office?
5. Does anyone know or is anyone related by blood or marriage to anyone who works for The Federal Bureau of Investigations?
6. Does anyone know or is anyone related by blood or marriage to anyone who works for Clay County Sheriff's Department?
7. Does anyone know or is anyone related by blood or marriage to anyone who works for Alabama Department of Corrections?
8. Does anyone know or is anyone related by blood or marriage to anyone who works for the United States Department of Agriculture and or the United States Forest Service?
9. Does anyone know or is anyone related by blood or marriage to anyone who works at the Alabama Department of Forensic Science or Jacksonville State University Department of Forensic Sciences?
10. Does anyone know or is anyone related by blood or marriage to a Yasmine Hider (no relation to the defendant)?

11. The judge who has been randomly selected to preside in this case is the Hon. David Proctor. Does anyone here know or know of Judge Proctor?
12. Is there anyone on the panel who has ever had any experience working in law enforcement (e.g., federal agent, police officer, deputy sheriff, military police)?
13. Is there anyone here related by blood or marriage to or does anyone have a close, personal friendship with a law enforcement officer?

***\* Would that relationship/friendship effect your ability to render a just and fair verdict, if you were selected to be a juror in this case?***

14. Has anyone ever studied law or received legal training of any kind? If so, what type of legal training have your received?
15. Has anyone ever been a victim of a crime? If so, what type of crime was it, when did it occur, and what was the outcome of the case brought against the perpetrator, if any?

***\*For those of you who have been victims of crimes, if selected to sit on this jury, do you believe in light of your experiences that you could be fair to both the defendant and the United States, and, accordingly, render a fair and impartial verdict based solely on the evidence and law as it pertains to this case?***

16. Is there anyone here who has ever had a bad experience with our criminal justice system? That is to say, you feel you were treated unfairly by a police officer, or a prosecutor, or a judge? Same question applies with regard to any of your family members and close, personal friends?
17. Does anyone have any opinion about courts, trials, prosecuting attorneys, or defense attorneys that would prevent you or impede you

from being fair and impartial in this case?

18. Does anyone on the panel regularly watch any television programs having law-related themes, such as "Law and Order," or any of the "CSI" programs that involve the investigation of crimes?
19. Is there anyone on the panel who has ever been a litigant, that is, a plaintiff or a defendant, in a case that went to trial? If so, what kind of case was it, in what court was the trial held, and what was the outcome?
20. Has anyone ever been called to testify in a legal matter in which you were not one of the parties? If so, what type of case was it, for whom did you testify (plaintiff or defendant), and what was the outcome of that case?
21. How many here have had previous experience sitting as a juror in either federal or state court? If this question applies to you, please tell the Court what type of case it was, the verdict in the case, if any, and whether you were the foreperson?
22. Does anyone drive a vehicle that has a bumper sticker or window sticker that has something other than "Alabama," "Auburn," "Roll Tide," or "War Eagle" written on it? If so, what is written on the sticker?
23. The Indictment charges the defendant with violating a federal firearms statute. Is there anyone here who does not own a firearm of any sort?
24. Is there anyone here who believes that the government should not be in the business of regulating the possession or use of firearms?
25. Is there anyone here who has a strong opinion - one way or the other - about the possession or use of firearms?
26. Is there anyone who has ever had to defend themselves against a violent act? Was a firearm involved?

27. Has anyone, a family member, or close personal friend, ever been investigated, charged, or convicted of a crime?
28. Is there anyone on the panel who is familiar with the area in/around Adam's Gap in the Cheaha Wilderness area in Clay/Cleburne County and the nearby area of Cheaha State Park and Talladega National Forest?
29. Has anyone here ever considered themselves as someone who lives "off-grid"?
30. As a juror, each of you ultimately will be called upon to sit in judgment of another person. Knowing that, is there anyone here who believes that he/she might have a problem performing that duty, perhaps because of some political, or religious, or social, or philosophical reason?
31. The Indictment charges Krystal Pinkins with murder, robbery, and kidnapping resulting in the shooting death of an individual. Some of the testimony and exhibits presented at trial will involve graphic depictions or descriptions of a violent act, additionally you will hear graphic and alarming sound recordings of an individual dying. Can you render a fair and impartial verdict if such graphic evidence is presented during trial?
32. If selected for this jury, you will be called upon to sit in judgment of another person. Knowing that, is there anyone here who believes that he/she might have a problem doing that, perhaps because of some political, or religious, or social, or philosophical reason?
33. Under the law a defendant can be held responsible for committing a crime even if the defendant only gave assistance and didn't know all of the details of the criminal activity. This is called aiding and abetting. How many of you have heard that term? Do any of you have a problem with the general concept of holding a defendant responsible for a crime if there is evidence that the defendant helped in some way

to make the crime succeed? Would any of you require the Government to prove that the defendant was involved in every aspect of the crime?

34. At the end of the evidence the Court will give you instructions that include a definition of aiding and abetting. The Court's definition of that charge may or may not fit your own notion of what it means to help others commit a crime. However, as jurors you are required to accept and to use the definition the Court gives you in reaching a verdict. Would any of you have a problem setting aside your own definitions or ideas about what it means to aid and abet a crime? If you should disagree with the way the law defines aiding and abetting, can you agree to set aside your personal opinions and use the definition the Court gives you to reach a verdict?